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May 5, 2003

VIA UPS OVERNIGHT

Eileen L. Furey
Associate Regional Counsel (C-14J)
USEPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507

RE: Response of American Fibrit, Inc. to Request for Information Pursuant to Section 104(e) of CERCLA for Allied Paper/Portage Creek/Kalamazoo River Superfund Site in Kalamazoo and Allegan Counties, Michigan

Dear Ms. Furey:

Enclosed please find the response of American Fibrit, Inc. to the above referenced §104(e) Information Request. If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

QUARLES & BRADY LLP

Rachel A. Schneider

RS2:lg1
Enclosures
cc: Dennis Reis
Greg Ingram

AMERICAN FIBRIT RESPONSES TO EPA INFORMATION REQUESTS

On March 7, 2003, American Fibrit, Inc. received a 104(e) information request seeking (1) information and documents regarding the release of hazardous substances, particularly PCBs, at and from any American Fibrit mill; (2) information to assist EPA determine to what extent American Fibrit purchased NCR paper broke or NCR paper trim; and (3) information to assist EPA determine the quantity and fate of PCBs contained in wastes generated at any American Fibrit mill from 1954-1989.

As a preface to responding to the specific requests, American Fibrit provides the following overview of its facility and operation. The American Fibrit mill in Battle Creek, Michigan, is the only facility of its kind in North America. It is also the only American Fibrit facility. The facility was built in 1977 by Deutschland Fibrit and began operating in 1978. American Fibrit, Inc. was incorporated in Michigan in November 1977.

The facility uses a proprietary German process to make door panels and other interior parts for vehicles out of wood fiber. Through 1989, wood chips from Michigan were the raw material feedstock that initiated the process. The chips were steamed, slivered and baled. (Beginning in 2000, slivered feedstock was purchased.) The slivered feedstock is put in a mixer and stewed in hot water with polyethylene and polystyrene fibers, a form of virgin pulp, a bonding agent and antibacterials to form an "oatmeal." The oatmeal mixture is propelled through a large hot press into the desired shape. The water is removed, the molded part is dried, and the finished part emerges.

The process has never used recycled materials from the paper industry. American Fibrit never purchased or used NCR paper broke, NCR converter trim, or any other pulp source that could be considered a source of PCBs in wastes. American Fibrit objects to these information requests as overbroad, vague and burdensome in that they seek information not relevant to determining the extent PCBs may or may not have been contained in wastes at or from American Fibrit.

Fiber Furnish and Paper Production

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

   Response No. 1: Greg Ingram, Environmental & Safety Coordinator, Simon Corey, Factory Manager, and Rowdy Turner, Process Engineer, American Fibrit, Inc., 76 Armstrong Road, Battle Creek, Michigan 49015, (269) 966-6445. Mr. Ingram, Mr. Corey and Mr. Turner may be contacted through counsel: Dennis Reis, Dennis Reis LLC, P.O. Box 170740, Milwaukee, Wisconsin 53217-8061, (414) 540-1005.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

   Response No. 2: Responsive and relevant documents are referenced in specific responses where applicable and enclosed with these responses.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request, or who may be able to provide additional responsive documents, identify such persons.

Response No. 3: None.

4. Identify and generally describe each American Fibrit mill, as that term is defined in Attachment 5.

Response No. 4: See introductory paragraphs. There is one American Fibrit mill located at 76 Armstrong Road, Battle Creek, Michigan. This mill was opened in 1978 by American Fibrit, Inc., a Michigan corporation since November 1977.

5. Identify current and prior owners of each American Fibrit mill identified in response to Request #4. For each such owner or prior owner, further identify:

Response No. 5: The American Fibrit mill has always been owned by American Fibrit, Inc. See Response No. 7.

a) the property owned;

b) the dates of ownership;

c) all evidence showing that the owner controls or controlled access to any portion of the property;

d) all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at or from the owner's property during the period of its ownership; and

e) the nature of each transaction by which ownership of the mill was transferred from one party to another (*e.g.*, stock purchaser, merger, asset sale, etc.)

6. Identify all current and prior operators, including lessors, of each American Fibrit mill identified in response to Request #4, or any portion thereof. For each such operator, further identify:

Response No. 6: There have been no other operators or lessors of the American Fibrit mill.

a) the property at which it conducts or conducted operations;

b) the dates of operation;

c) the nature of the operator's operations;

d) all evidence that the operator controls or controlled access to the property or any portion thereof; and

e) all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the portion of the property at which the operator conducts or conducted operations.

7. Identify each source or potential source of the release of hazardous substances, pollutants, or contaminants (*e.g.*, polychlorinated biphenyls or "PCBs") from the American Fibrit mill including, without limitation:

Response No. 7: See responses to each subpart below.

a) discharges of total suspended solids ("TSS") in wastewater;

a) Wastewater from the American Fibrit mill is discharged to the Battle Creek, Michigan POTW. The document at Attachment A summarizes data on suspended solids in the wastewater from 1986 to date. Attachment B is an analytical report from November 1995 and is the oldest analytical report located regarding the mill's wastewater discharge. The manufacturing process in 1995 was the same as from 1978-1989.

b) erosion from waste disposal areas located at the American Fibrit mill or elsewhere (*e.g.*, landfill areas) used for the disposal of wastes generated at the American Fibrit mill;

b) There are no waste disposal areas located at the American Fibrit mill. Dry solid waste which cannot be reprocessed is disposed by Waste Management of Battle Creek.

c) exceedances of TSS loading limits established by the State of Michigan and/or U.S. EPA;

c) Not applicable.

d) dewatering lagoon areas located at the American Fibrit mill;

d) Not applicable.

e) storm sewer leaks and discharges;

e) American Fibrit experienced an explosion in 2002 which caused a release of 60-80 gallons of heat transfer fluid to the stormwater drain, but is not aware of any other leaks and discharges from its machines, transformers or other equipment at its mill. See Attachment C (additional documentation available upon request).

f) sewer line leaks and discharges; and

f) In 1998, the mill experienced a small release of an oil/water mixture to the sewer. See Attachment D.

g) machine, transformer or other equipment leaks and discharges.

g) See Response No. 7(e).

8. Identify any data, analyses or other information regarding the nature and quantity of hazardous substances released from each source or potential source you identified in response to Request #7, above. To the greatest extent possible, identify any such data, estimates, analyses or other information on an annual basis from 1954 through 1989.

Response No. 8: See Response No. 7.

9. For the period 1954 to 1989, identify for each year the types and amounts of fiber furnish used at each American Fibrit mill in tons. Fiber furnish may include, but is not limited to, old corrugated container (OCC); double-lined kraft (DLK); paperboard; mixed waste paper; fine paper, bond, ledger, envelopes; old newsprint (ONP); pulp substitutes (specify type and source), purchased secondary fiber pulp (specify source); and virgin pulp (specify type).

Response No. 9: Northern bleached kraft pulp, a virgin pulp (no recycled content), is added to the wood fiber mixture and constitutes approximately 20-30 percent of the product. In 2002, the mill used 1208 tons of this kraft pulp and similar quantities would have been used in past years. See Attachment E.

10. For the period 1954 to 1989 and for each American Fibrit mill, identify the types and amounts of paper products produced annually in tons.

Response No. 10: None, American Fibrit produces wood fiber products, not paper products.

11. For each paper product identified in response to Request #10, identify calculated shrinkage (*i.e.*, yield on fiber furnish) for each paper product on an annual basis. If not available, identify typical or estimated shrinkage for each paper product.

Response No. 11: Not applicable.

12. Identify, for each American Fibrit mill, the annual operating days per year.

Response No. 12: Information from the relevant time frame is no longer available. From 1997 through 2002, the mill operated 300 to 350 days per year.

13. For the period 1954 through 1971, identify the dates (month and year) and amounts in pounds of NCR paper broke that you purchased directly or otherwise obtained from any

of the sources listed in Attachment 2, or from any other NCR paper coating facility.

Response No. 13: None.

14. For the period 1954 through 1971, identify the dates (month and year) and amounts in pounds of NCR paper broke and/or NCR paper converter trim that you purchased or otherwise obtained directly from or through any waste paper broker listed in Attachment 3, or from any other person. Identify, to the extent possible, the name and address of the waste paper broker or other person from whom the NCR paper broke and/or NCR paper converter trim was obtained or purchased.

Response No. 14: None.

15. For the period 1954 through 1989, identify the dates (month and year) and amounts in pounds of post-consumer waste paper that you purchased or otherwise obtained directly from or through any waste paper broker listed in Attachment 3, or from any other person. To the extent possible, identify the name and address of the waste paper broker or other person from whom the post-consumer waste paper was purchased or otherwise obtained.

Response No. 15: None.

16. To the extent available and not otherwise identified in response to Requests #14-15 above, identify the current names, addresses and phone numbers for all waste paper brokers or other person from whom you purchased or otherwise obtained any type of secondary fiber during the period 1954 to 1989.

Response No. 16. None.

Process Water Management; Wastewater Treatment; Wastewater Sludge Disposal

17. For the period 1954 to 1989 and for each American Fibrit mill, identify the dates (month and year) when save-alls were installed and/or upgraded on each paper machine at the mill.

Response No. 17: Not applicable.

18. For each save-all identified in response to Request #17, specify the type of each save-all and the estimated efficiency of fiber recovery in per cent.

Response No. 18: Not applicable.

19. For the period 1954 to 1989 and on an annual basis, identify the volume and disposition of each of the wastewater streams generated at each American Fibrit mill (*e.g.*, discharged directly to a receiving water with or without treatment; discharged indirectly through a municipal sewerage system; or discharged to an off-site industrial wastewater treatment system), including but not limited to:

- Pulping and/or deinking wastewaters
- Paper machine whitewaters
- Other process and non-process wastewaters (Identify.)

(Reported volumes of the process wastewaters should be specified in either gallons per minute (gpm), gallons per day (gpd), or million gallons per day (mgd).)

Response No. 19: From 1978 to 1989, the American Fibrit mill discharged its wastewater to the Battle Creek, Michigan POTW. Currently, the mill uses and discharges an average of 35,000 gallons of water per month. Usage data from 1978-1989 has not been located.

20. For the period 1954 to 1989 and on an annual basis, for each of the process wastewater streams identified in response to Request #19, identify the type(s) of on-site wastewater treatment, if any, provided (*e.g.*, settling lagoons, primary treatment in clarifiers, secondary biological treatment; advanced wastewater treatment). Provide schematic diagrams of the wastewater treatment facilities and monthly wastewater treatment system operating data for bypassed flow (*i.e.*, untreated or partially treated wastewaters), treated effluent flow and untreated and treated wastewater total suspended solids (TSS) concentrations and mass discharges (*e.g.*, pounds per day).

Response No. 20: Not applicable.

21. For the period 1971 to 1989 and on an annual basis, identify the amount in dry tons of wastewater treatment sludge generated at each American Fibrit mill and the disposition of the sludge (*e.g.*, disposed in on-site or off-site landfills).

Response No. 21. None.

22. Identify the name and location of any facility used for the disposal of wastewater treatment sludge generated at each American Fibrit mill.

Response No. 22: None.

23. Identify any data, analyses or other information regarding potential erosion of waste materials from any lagoon, landfill or other disposal facility identified in your response to Requests #19-22.

Response No. 23: None.

Information Regarding PCBs

24. For each American Fibrit mill, provide copies of all reports, data or other records showing PCB concentrations in the following materials:

Fiber furnishes used at the mill
Paper products produced at the mill

Untreated and treated wastewaters generated at the mill
Wastewater treatment sludges generated at the mill
Atmospheric emissions from the mill
Machine, transformer or other oils used at the mill

Response No. 24: Not applicable.

25. Provide copies of all reports, data or other records in your possession, whether generated by American Fibrit or its consultants, generated by paper industry trade associations and/or research organizations, or generated by government agencies and organizations, showing PCB concentrations in the following materials: secondary fibers used as furnishes to secondary fiber pulp and paper mills; pulp substitutes; virgin pulps; any paper mill products, (*e.g.*, paper, paperboard, tissue); process wastewaters; wastewater treatment sludges; atmospheric emissions, or other materials associated with the pulp and paper industry.

Response No. 25: American Fibrit has no such reports, data or other records in its possession.

A

	SAMPLE DATE	QTR	YR	KAR LAB PROJECT NUMBER	COLLECTION PERIOD (HRS)	BOD	PH	Suspended Solids	2,4,6 TRICLORO-PHENOL	2,4 DICLORO-PHENOL	2-CLORO-PHENOL	PENTA-CLORO-PHENOL
	BC ORD LIMIT					470mg/L	5 5 - 9 5	820mg/L	0 7mg/L	7 1mg/L	4 2mg/L	2 35mg/L
	22-Apr-03 wastewat wk3											
	3/4/03	1	3	30860	48	286	7 6	122	NA	NA	NA	NA
	1/2/03	4	2	27045	48	247	8 2	180	NA	NA	NA	NA
	9/9/02	3	2	24706	48	112	7 7	20	NA	NA	NA	NA
	5/22/02	2	2	22358	48	297	7 9	136	<0 005mg/L	<0 005mg/L	<0 005mg/L	NA
	3/8/02	1	2	21039	48	209	7 3	77	NA	NA	NA	NA
	1/8/02	4	1	16874	48	154	7 1	30	<0 005mg/L	<0 005mg/L	<0 005mg/L	N/A
	10/12/01	3	1	15228	48	136	7 1	52	N/A	N/A	N/A	N/A
	6/19/01	3	1	12788	48	91	7 2	23	<0 01 mg/l	<0 01 mg/l	<0 01 mg/l	N/A
	3/22/01	2	1	11179	48	189	7 3	82	N/A	N/A	N/A	N/A
	12/15/00	1	1	6519	48	202	7 5	147	<0 005mg/L	<0 005mg/L	<0 005mg/L	N/A
	10/11/00	4	0	4983	48	164	7 3	332	N/A	N/A	N/A	N/A
	6/7/00	3	0	2397	48	135	7 4	68	<0 01 mg/l	<0 01 mg/l	<0 01 mg/l	N/A
	3/27/00	2	0	1227	48	115	7 8	132	N/A	N/A	N/A	N/A
	1/26/00	1	0	208	48	127	7 7	114	<0 005mg/L	<0 005mg/L	<0 005mg/L	N/A
	10/14/99	3	99	994864	48	113	7 6	167	N/A	N/A	N/A	N/A
	7/19/99	2	99	993156	48	267	7 2	204	<0 005mg/L	<0 005mg/L	<0 005mg/L	N/A
	4/7/99	1	99	991306	48	301	7 6	336	N/A	N/A	N/A	N/A
	12/29/98	4	98	985283	48	77	7 6	32	<0 005mg/L	<0 005mg/L	<0 005mg/L	N/A
	09/15/98	3	98	983554	48	95	7 6	35	N/A	N/A	N/A	N/A
	06/26/98	2	98	982395	48	182	7 2	273	<0 01mg/L	<0 01mg/L	<0 01mg/L	N/A
	03/10/98	1	98	980622	48	186	8	150	N/A	N/A	N/A	N/A
	12/03/97	4	97	974184	48	112	7 4	37	N/A	N/A	N/A	N/A
	09/02/97	3	97	972922	48	101	7 7	151	N/A	N/A	N/A	N/A
	06/19/97	2	97	971509	48	128	7 7	89	N/A	N/A	N/A	N/A
	02/17/97	1	97	970345	48	185	8	46	N/A	N/A	N/A	N/A
	12/03/96	4	96	963225	48	77	7 9	126	N/A	N/A	N/A	N/A
	08/26/96	3	96	962153	48	5	7 6	12	N/A	N/A	N/A	N/A
	06/14/96	2	96	961450	48	199	7 6	427	N/A	N/A	N/A	N/A
	03/13/96	1	96	960519	48	197	8 2	53	N/A	N/A	N/A	N/A
	11/27/95	4	95	953392	48	28	7 8	54	<10ug/L	<10ug/L	<10ug/L	<10ug/L
	09/13/95	3	95	952661	48	486	7 4	603	N/A*	N/A*	N/A*	N/A*
	05/18/95	2	95	951480	48	148	8 2	314	N/A*	N/A*	N/A*	N/A*
	02/15/95	1	95	950375	48	77	7 6	156	N/A*	N/A*	N/A*	N/A*
	12/08/94	4	94	943577	48	80	8 3	173	<10ug/L	<10ug/L	<10ug/L	<10ug/L
	08/22/94	3	94	942391	47	28	7 6	60	N/A*	N/A*	N/A*	N/A*
	05/24/94	2	94	941335	48	89	7 8	240	<10 ug/L	<10 ug/L	<10 ug/L	<10 ug/L
	03/07/94	1	94	940516	48	342	7 4	1000	N/A*	N/A*	N/A*	N/A*
	12/09/93	4	93	933433	48	190	7 4	473	<10 ug/L	<10 ug/L	<10 ug/L	<10 ug/L
	09/03/93	3	93	932304	48	101	7 2	200	N/A*	N/A*	N/A*	N/A*
	07/28/93	SPECIAL		931917	48			1080				
1	05/13/93	2	93	930148	48	232	7 4	1050	<10 ug/L	<10 ug/L	<10 ug/L	<10 ug/L
1	02/17/93	1	93	930357	48	121	7 5	234	N/A*	N/A*	N/A*	N/A*
	01/25/93	4	92	930183	48				<10 ug/L	<10 ug/L	<10 ug/L	<10 ug/L
1	12/02/92	4	92	922816	48	352	7 5	544	not avail	not avail	not avail	not avail
1	08/28/92	3	92	921895	48	242	7 9	701	N/A*	N/A*	N/A*	N/A*
1	06/10/92	2	92	921155	48	158	7 8	178	0 02	0 02	0 02	0 02
1	03/06/92	1	92	920393	48	120	7 7	79	N/A*	N/A*	N/A*	N/A*
1	10/30/91	4	91	912309	48	21	7 9	705	0 01	0 01	0 01	0 01
1	07/25/91	3	91	911587	48	116	7 6	360	N/A*	N/A*	N/A*	N/A*

1	05/09/91	2	91	910960	48	118	7.5	164	0.01	0.01	0.01	0.01
1	02/15/91	1	91	910328	48	271	8.5	91	N/A*	N/A*	N/A*	N/A*
1	11/13/90	4	90	903088	48	126	7.5	271	0.01	0.01	0.01	0.01
1	08/07/90	3	90	902200	48	44	7.4	252	N/A*	N/A*	N/A*	N/A*
1	05/08/90	2	90	901363	48	155	7.7	433	0.01	0.01	0.01	0.01
1	02/13/90	1	90	900484	48	98	7.8	113	N/A*	N/A*	N/A*	N/A*
1	11/09/89	4	89	892265	48	138	7.8	803	0.01	0.01	0.01	0.01
1	08/10/89	3	89	891572	48	93	7.4	297	0.01	0.01	0.01	
1	06/01/89	2	89	891012	48	89	7.4	151	N/A*	N/A*	N/A*	
1	02/08/89	1	89	890233	24	119	7.5	989	0.01	0.01	0.01	
1	11/08/88	4	88	882072	24	194	7.3	396	N/A*	N/A*	N/A*	
1	08/16/88	3	88	881477	24	143	7.5	399	0.01	0.01	0.01	
1	06/08/88	2	88	881049	24	125	7.4	184	0.01	0.01	0.01	
1	03/23/88	1	88	880433	24	158	7.5	254	N/A*	N/A*	N/A*	
1	12/08/87	4	87	871906	24	200	7.2	373	N/A*	N/A*	N/A*	
1	09/16/87	3	87	871400	24	627	7.3	276	N/A*	N/A*	N/A*	
1	05/20/87	2	87	870754	24	224	7.3	355	N/A*	N/A*	N/A*	
1	03/18/87	1	87	870367	24	260	7.1	184	N/A*	N/A*	N/A*	
1	12/19/86	4	86	861687	24	81	6.6	461	N/A*	N/A*	N/A*	

B

KAR Laboratories, Inc.
4425 Manchester Road
Kalamazoo, MI 49002

(616) 381-9666

American Fibrit, Inc.
76 Armstrong Road
Battle Creek, MI 49015

Attn : ***Mr. Fred Cini***

KAR Project No. :	***953392***
Date Reported :	***11/27/95***
Date Activated :	***11/09/95***
Date Due :	***11/27/95***
Date Validated :	***11/27/95***

Project Description : ***Semi-annual wastewater sampling and analysis.***

Dear Client,

This laboratory report represents KAR Laboratories' analysis of samples associated with the above-referenced project. Unless otherwise stated (under "Comments" heading) all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and results represent the samples as they were received.

In the event that you need to contact us about this work please mention KAR Project No. 953392. To arrange additional sampling or testing please contact our Client Services Manager, Julie Addy. If you have a question regarding quality assurance please contact William Rauch.

Thank you for this opportunity to serve you. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,

Michael J. Jaeger
Director of Laboratories

ANALYTICAL REPORT

KAR Project No. : 953392

Client: *American Fibrit, Inc.*

Date Reported : *11/27/95*

Project Description : *Semi-annual wastewater sampling and analysis.*

Sample ID : *"48 Hr. Composite, 11/7-9/95, 10:23-12:08pm"*

Sampled By : *SNH of KAR Laboratories*
Sample Date :
Sample Time :

Date Received : *11/9/95*
Sample Type : *aqueous*
KAR Sample No. : *953392-01*

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
BOD	*28*	*mg/L*	*SM Ed18 5210 B*	*11/10/95*	*ALW*	
Suspended solids, total	*54*	*mg/L*	*EPA 160.2*	*11/10/95*	*PML*	

Sample ID : *"Grab"*

Sampled By : *SNH of KAR Laboratories*
Sample Date : *11/9/95*
Sample Time : *12:08pm*

Date Received : *11/9/95*
Sample Type : *aqueous*
KAR Sample No. : *953392-02*

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
PH	*7.8*	*S.U.*	*EPA 150.1*	*11/9/95*	*CAS*	
2,4,6-Trichlorophenol	*<10*	*ug/L*	*EPA 8270B*	*11/16/95*	*KTL*	
2,4-Dichlorophenol	*<10*	*ug/L*	*EPA 8270B*	*11/16/95*	*KTL*	
2-Chlorophenol	*<10*	*ug/L*	*EPA 8270B*	*11/16/95*	*KTL*	
Pentachlorophenol	*<10*	*ug/L*	*EPA 8270B*	*11/16/95*	*KTL*	

3571

Client: American Fibrit

Attn: MR. FRED CINI
Phone: (616) 968-3000

P.O.#

# of samples: 2

Sampled by:
☑ KAR
☐ Client

Turnaround time:
☑ Std $ X 1.0 ☐ 1-Wk $ X 2.0
☐ 2-Wk $ X 1.5 ☐ Emerg $ X 3.0
☐ UST (2-Wk)

Collected by: S. Hl

Requested analyses: pH; BOD; Suspended solids, total; 2,4,6 - Trichlorophenol; 2,4 - Dichlorophenol; 2 - Chlorophenol; Pentachlorophenol

KAR use only
Proj#: 953392
Date: 11/9/95
Login: WJE
Source:
memo label
phone paper
delivery
other (specify)

Sample ID	Date	Time	TypSmp	Bottle Type	Bottle Size	Bottle #	pH	BOD	Suspended solids, total	2,4,6 - Trichlorophenol	2,4 - Dichlorophenol	2 - Chlorophenol	Pentachlorophenol	Remarks
-01 48 hour comp	11/7/95	10:23	WW	P	Liter	1		✓	✓					
(to	11/4/95	12:00	—	—	—	—								
-02 Grab	11/4/95	12:08	WW	G Amber	950ml	2				✓	✓	✓	✓	in duplicate
	11/4/95	12:04	WW	P	250mL	1	✓							

Relinquished by: S. Hl
Date/Time: 11/9/95 2:45p

Received by: G. Ewin
Date/Time: 11/9/95 2:45pm

COMMENTS:
Proj. desc.: Semi-annual wastewater sampling and analysis.
Sampling charge: $190.00.

KARLaboratories, Inc.

4425 Manchester Road

Kalamazoo, MI 49002

Phone 616 381-9666

Fax 616 381-9698

Copy Kini

INVOICE

American Fibrit, Inc.
76 Armstrong Road
Battle Creek, MI 49015

Attn: Mr. Fred Cini

Project No.: 960519
Date Activated: 3/01/96
Date Reported: 3/13/96
PO#: 96-0012

Project Desc.: Quarterly sampling and analysis of one wastewater discharge.

Quan	Item
1	BOD
1	PH
1	Suspended solids, total

Quoted Price 216.00

TOTAL DUE $ 216.00

Please indicate Project No. 960519 on check stub or voucher.

I.D. #38-2476290
A FINANCE CHARGE OF 1 1/2% PER MONTH (18% PER YEAR)
WILL BE ADDED TO BALANCES AFTER 4/12/96.
ORIGINAL INVOICES ARE SENT TO ACCTS. PAYABLE.

Client: American Fibrit

Attn: Fred Cini

Phone: 968-3000 Fax:

P.O. # (1996) 95-0003

Of Samples 2

Sampled By: ☒ KAR ☐ Client

Collected By: S. Hl

Turnaround Time:
☒ Std $ x 1.0 ☐ 5 Day $ x 1.5
☐ Emerg-By Quote
Standard is 10 working days)

Act 307 LOD: ☐ Yes ☒ No

MUSTFA: ☐ Yes ☒ No

Requested Analyses: BOD, TSS; pH

KAR use only
KAR Laboratories, Inc.
Proj#: 960579
Date: 3/1/96
Login: FLL
Source:
Memo Label
Phone Paper
Delivery Month

#	Sample ID	Date	Time	TypSmp	Bottle Type	Bottle Size	Bottle #	BOD, TSS	pH	Remarks
1	48 Hr. Composite	2/28/96	2:35	ag	P	1L	1	✓		
	to	3/1/96	2:44							
2	Grab	3/1/96	2:44	ag	P	250ML	1		✓	

Relinquished By: S. Hl — Date/Time: 3/1/96 4:02p

Received By: Emma Lowry — Date/Time: 3/1/96 4:13pm

Comments: Quarterly ~~or~~ sampling and analysis of one wastewater discharge

1996 QTR
$216.00/event

Sampling charge $190.00

C

25 July 2002

Environmental Report on Battle Creek 07/22/2002 Therminol Spill

I. Summary of Current Environmental Status:

- Battle Creek facility cleaned by K&D
- Battle Creek storm drains power washed/vacuumed by K&D
- Battle Creek parking lot cleaned by K&D
- Pond and drainage ditch are contaminated and require site remediation
- Pond and stream are located on Fort Custer property

II. Follow-up Items:

- Official written report due to PEAS by 31 July – responsibility = René Kalkman/Greg Ingram
- Water and soil samples taken for laboratory analysis – responsibility = ETW (Dan Capone)
- Scope of work submitted by ETW to Mike Stoelton for approval – responsibility = Mike Stoelton
- Send written PEAS report, laboratory analysis, and MSDS to:
  - PEAS/SERC
  - US EPA
  - Fort Custer
  - MDEQ Emergency Response Division
  - LEPC
  - responsibility = René Kalkman
- Method of remediation needs to be determined – responsibility = ETW
  Timing = TBD
  - Information from Solutia gathered
  - Results of soil and water sample testing
  - ETW will prepare remediation plan including cost and methods
    - Potential remediation methods:
      - Dredging
      - Bio-remediation
      - Vacuum and treat
  - Need approval of plan from:
    - Mike Stoelton
    - Fort Custer
    - MDEQ - ERD

III. Discussions and notes:

On July 22, 2002, an explosion occurred at the Johnson Controls Battle Creek facility. Initial investigations indicate a pump failure created a vapor mist of Therminol 59, which was ignited by the pilot light of the boiler. The explosion caused a fire of the roofing materials and the wall insulation. Additionally, there was a release of approximately 3,000 gallons of Therminol 59. Some of the release was contained within the building, and an unknown volume was released to the parking lot and corresponding storm water drains. On-site employees contained a large portion of the spill. A heavy rainfall occurred during the emergency services response. The local fire department was able to extinguish the fire in approximately 20 minutes. The rainfall and the water used by the fire department carried the spill material to the storm drains and the retention pond located on the Fort Custer National Cemetery grounds.

Fort Custer officials were immediately contacted to notify them of the potential contamination issues. The Director of Safety, Mr. Saul Alverez, talked with Greg Ingram and extended an offer of any help they could provide. He also requested copies of any written reports and any laboratory analysis of the soil or water.

Greg also notified the Michigan Department of Environmental Quality (MDEQ) as soon as the fire was extinguished by contacting the Pollution Emergency Alert Systems phone number (PEAS). The PEAS call automatically notifies the State Emergency Response Committee.

An outside contractor, K&D Disposal was contacted to clean up the spilled oil. They arrived on site 22 July and proceeded to vacuum the standing spilled oil from the parking lot.

On 23 July 2002, an Earth Tech consultant was requested to conduct reconnaissance of the site and assess the extent of the environmental impact. Earth Tech made an initial assessment of the spill to report to Mike Stoelton.

The initial site reconnaissance showed oil present in the storm drains and a sheen of oil on the top of the retention pond located on the Fort Custer property. Two separate storm drains are used at the Battle Creek facility. One storm drain runs above ground directly to the pond. The second drain runs underground and surfaces about 50 feet before the pond. Both drains show oil present in them. It was suggested to pump out the above ground storm drain and to "jet" the underground drain to flush out any residual oil in the drain. In order to avoid further oil contamination, a boom was placed at the mouth of the pond where the storm drain feeds into it. It was also suggested that future remediation would be needed for the soil and vegetation of the storm drains and for the pond and its shoreline.

A review of the applicable environmental regulations and required reports began. The Release Notification Requirements in Michigan chart was referenced to determine the appropriate state and federal agencies to notify of the incident.

A discussion was held with Bob Crump of Earth Tech to determine if the pond was classified as a wetland. The pond is a naturally occurring low land, and does not drain out. The pond does not present the typical wetland vegetation or wildlife. This area is not considered a wetland, and is exempt from those regulations.

On the afternoon of 23 July, the following regulatory agencies were notified of the incident; The National Response Center, The State Emergency Response Committee, and The Local Emergency Planning Committee.

Waste Management was contacted through Heritage Interactive Services to provide open top dumpsters and roll-off containers for the site clean up of building debris.

K&D arrived on site to pump out the Therminol in the boiler room, and the storm water drains. All of the materials cleaned up have been removed as non-hazardous waste and Greg has sent the appropriate paperwork to the State.

Mr. John Volmer called in regards to the PEAS notification. He noted that Ms. Debra Quinn from the MDEQ Surface Water Division would contact me tomorrow regarding the incident.

On 24 July 2002, Mr. Bob Buckley from the USEPA and the Local Emergency Planning Committee (LEPC) called to confirm the information reported to the LEPC, and to notify JCI that members of the LEPC may arrive on site to clarify any questions regarding the report.

Mr. Saul Alverez, Supervisor of Industrial Hygiene and Technical Advisor of the Fort Custer Cemetery was contacted to relay the information regarding the initial spill site assessment. He agreed with our initial report and asked to have a copy of the PEAS report and any laboratory analysis sent to him. He also asked that Mr. Chris Cooper, the Regional Director of the National Cemeteries be contacted to inform him of the details of the incident and projected clean up. Mr. Cooper was contacted and given the incident details. He gave JCI approval to sample both the water and soil in the area, but asked that we send him a written proposal of the clean up and remediation prior to starting any of the work. He needs to forward this information to his superiors in Washington D.C. Mr. Cooper also mentioned that he has asked Fort Custer to restrict access to only three of their employees, and requested that we contact Mr. Kenny Haynes, Fort Custer Cemetery Grounds Supervisor prior to entering the area, so Mr. Haynes may log who visits the site.

Mr. Walter F. Nied Jr. from the US EPA arrived on site to assess the environmental impact and review the clean up efforts. He was pleased that K & D had been contacted and that Earth Tech had been enlisted to help. He had worked with both companies previously, and agreed with the clean up methods that were being conducted. He recommended that JCI continue to use absorbent mats to remove the oil, and that a bio-remediation media could be sprayed on the shoreline and storm water drains to address the residual oil. Mr. Nied did not feel the need for any follow up visits from the US EPA.

Ms. Debra Quinn from MDEQ Surface Water Division called to gather details regarding the clean up efforts and to relay that ground water seepage may require some water samples to be taken and some soil removal to occur based on those results. She suggested that JCI take samples at different stratas of the pond to show a representative sample of the Therminol in solution. Additionally, it was determined to sample the pond bottom and shoreline and also the storm drain bottom and shoreline to determine any soil contamination. Ms. Quinn also mentioned that while she is responsible for surface and ground water, Mr. Dave Heywood of the Emergency Response Division is responsible for any soil contamination. Mr. Heywood was contacted and a voice mail left with him. Greg Ingram and Dan Capone were notified of the need to sample. Mike Stoelton was contacted to confirm it would be acceptable to sample prior to the approval of the formal clean up plan. He agreed it would be prudent to sample the site as soon as possible.

Mr. Dan Capone called to discuss the remediation efforts and to clarify the sampling plan. He mentioned that the Therminol does not respond well to standard remediation techniques and that further research would be necessary. He would like to try to find a suitable bio-remediation technique as opposed to dredging the soil in the drains and the pond. This concern had been voiced by the Fort Custer team.

Mr. Dave Heywood of the ERD called and inquired about the clean up. The sampling protocol was discussed, and he agreed the approach seemed correct. He referenced the DEQ guidance document entitled "Verification of Soil Remediation" for us to review in order to follow the DEQ protocol.

The clean up efforts continue to be conducted. Reference the follow-up items at the beginning of this report for future actions.

D

BECKER GROUP INC.
TO- R. TURNER
FROM- S. COREY
03/02/98

SUBJECT- KONUS OIL RELEASE TO THE CITY OF BATTLE CREEK WASTER WATER SYSTEM

DUE THE THE RECENT RELEASE OF A SMALL AMOUNT OF KONUS OIL DURING THE PUMPING OF THE HOT OIL LINE PITS, WE WILL IMMEDIATELY STOP PUMPING THE PITS ON THE OFF-SHIFTS. THIS TASK SHALL ONLY BE DONE ON FIRST SHIFT, AND WILL BE DONE ONLY UNDER THE DIRECTION OF YOUR SELF, MYSELF, OR NELLO HOFFMAN. THIS MUST BE STRICTLY ADHERED TO AS MIKE ANDREWS FROM THE CITY WASTE WATER DIVISION HAS ASKED US TO DO THIS AS HE HAS MORE PEOPLE ON HIS DAY SHIFT CREW TO HANDLE SITUATIONS LIKE THIS.

THE PROPER PROCEDURE IS TO PUMP OUT MOST OF THE WATER FROM UNDERNEATH THE FLOATING OIL, TO THE CITY DRAIN. THE OIL IS TO BE PUMPED INTO 55 GALLON DRUMS FOR TRANSFER INTO OUR WASTE OIL STORAGE TANK FOR PROPER DISPOSAL. I SUGGEST THAT WE APPOINT TWO PERSONS ON FIRST SHIFT PRESSROOM, AND TRAIN THEM ON PUMPING THE PITS AND EXPLAIN TO THEM THE IMPORTANCE OF NOT ALLOWING ANY OIL TO BE PUMPED TO THE CITY DRAIN.

THIS INCIDENT HAS NOT RESULTED IN ANY ACTION BY THE CITY, AND IF WE MONITOR THE PUMPING PROCESS MORE CLOSELY, WE CAN AVOID ANY FUTURE PROBLEMS LIKE THIS.

MIKE ANDREWS IS OUR TECHNICAL CONTACT AT THE CITY, (616-966-3513). PLEASE ADVISE OUR PRESSROOM SUPERVISORS AND MAINTENANCE SUPERVISORS, THAT IF IN THE FUTURE, THERE ARE ANY KNOWN RELEASES, INTO THE CITY DRAIN, THAT YOUR SELF OR MYSELF MUST BE CONTACTED SO WE CAN NOTIFY THE CITY AHEAD OF TIME.

SINCERELY,

S. Corey

SIMON COREY

CC.
S. CLARK
N. DAVIS
N. HOFFMAN
K. KUENSTLER
M. ANDREWS- CITY WASTE WATER DIVISION

E

WESTERN PULP

Western Pulp Limited Partnership
Western Pulp Inc. (General Partnership)
2300 - 1111 West Georgia
Vancouver, B. C. Canada V6E 4M3

COMPLETED 9000105

SAFETY DATA SHEET

KRAFT PULP

SECTION I - PRODUCTION IDENTIFICATION

PRODUCT NAME: Northern Bleached Kraft Pulp, Chemical Pulp		
TYPE OF PRODUCT: Kraft Pulp		
WHMIS: [ ] Yes: [ ] No	CLASSIFICATION: N/A	PHONE NUMBER: 604-692-6694

SECTION II - HAZARDOUS INGREDIENTS

CAS REGISTRY NO.	% by Weight	CHEMICAL NAME(S)	TOXICITY
9004-34-6	82	Cellulose	ACGIH-TLV 10 mg/m^3 Total
N/A	18	Hemicellulose	Not Available

SECTION III - PHYSICAL DATA

APPEARANCE:		ODOUR: None	
pH (Aqueous Slurry):	5.6	PERCENT VOLATILE BY VOLUME (%):	<1%
BOILING POINT (°C):	N/A	SOLUBILITY IN WATER:	0%
SPECIFIC GRAVITY:	0.88 - 1.08	EVAPORATION RATE (WATER = 1):	N/A

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method Used) (°C): >600	EXTINGUISHING MEDIA: Water fog
SPECIAL FIRE AND EXPLOSION HAZARDS: None	
UNUSUAL FIRE AND EXPLOSION HAZARDS: None - Treat as paper fire	

SECTION V - HEALTH HAZARD DATA

EFFECT OF OVEREXPOSURE:	HAZARD RATING	
SWALLOWING: Not toxic	HEALTH	0
SKIN ABSORPTION: N/A	FLAMMABILITY	0
INHALATION: Excessive dust may cause bronchial irritation	REACTIVITY	0
SKIN CONTACT: N/A	SPECIAL WARNING: None	
EYE CONTACT: Airborne dust may cause foreign body irritation.		

SECTION VI – EMERGENCY AND FIRST AID PROCEDURES

INGESTION. N/A

SKIN: N/A

INHALATION: Remove from exposure to dust. If breathing is difficult administer oxygen

EYES: Flush eyes with water. Contact a physician if irritation persists.

SECTION VII - REACTIVITY DATA

STABILITY:	UNSTABLE		CONDITIONS TO AVOID: None
	STABLE	X	
INCOMPATIBILITY (*Materials to avoid*): None			
HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID: None
	WILL NOT OCCUR	X	

SECTION VIII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Treat as waste paper

WASTE DISPOSAL METHOD: Follow local regulation regarding disposal of waste paper

SECTION IX - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (*Specify type*): No

VENTILATION:	LOCAL EXHAUST: Required to control dust if present	SPECIAL - None
	MECHANICAL (*General*)	OTHER - None
PROTECTIVE GLOVES: Recommend cotton gloves		OTHER - None
OTHER PROTECTIVE EQUIPMENT: No		

SECTION X - STORAGE, HANDLING AND SHIPPING INFORMATION

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Normal handling processes **Keep Away From Open Flame**, Provide adequate ventilation if dust is present

OTHER PRECAUTIONS: None

TDG CLASS: None	PIN: N/A	TDG EMERGENCY PHONE NUMBER: 613-996-6666 (Collect)

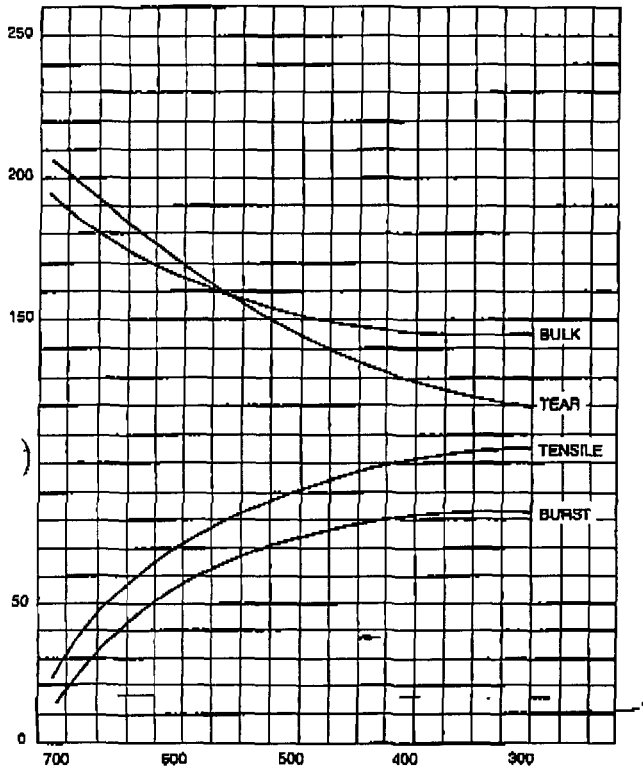
SECTION XI - PREPARATION DATA

PREPARED BY:	A. N. Thakore	DATE:	May 14, 2001
DEPARTMENT:	Technical - Technical Superintendent	TELEPHONE:	604-890-6695

WESTERN PULP Cellulose **SQUAMISH-H**

woodfiber mix

SQUAMISH-H is made from select west coast wood species which provide a good balance between high tear and high tensile strength. This is achieved by controlled blending of Douglas Fir, Western Hemlock and Western Red Cedar. The pulp after cooking is bleached with 50% chlorine dioxide substitution in the chlorination stage in a computer-controlled displacement bleach plant, producing pulps of very high brightness, extremely low dirt, and high intrinsic physical properties.



CANADIAN STANDARD FREENESS (mls)

CURVE SCALE

Burst Factor	×1.0
Tear Factor	×1.0
Tensile	×0.1
Bulk	×0.01

TYPICAL DATA

BRIGHTNESS, % ISO*	88.0
VISCOSITY, 0.5% CED, cp**	17.0
BAUER McNETT FIBRE CLASSIFICATION, %	
Retained on 14 Mesh	56.0
Retained on 28 Mesh	24.0
Retained on 48 Mesh	10.0
Retained on 100 Mesh	4.0
Fines through 100 Mesh	6.0

PAPER PHYSICAL PROPERTIES***

C.S.F., mls	600	500	400	300
BURST FACTOR	58	76	82	85
TEAR FACTOR	168	145	130	120
TENSILE, km	7.3	9.3	10.2	10.8
BULK, cc/g	1.62	1.54	1.50	1.47
OPACITY, %	66	62	61	60
FOLD COUNT	1540	2260	2400	2400

NOTES

*As per ISO procedure on machine sheet.

**Viscosity as per TAPPI T-230, 0.5% Cuene.

***Appropriate 95% confidence levels will be stated for shipments.

10-90

Western Pulp Limited Partnership
Western Pulp Inc. (General Partner)
1300-355 Burrard Street
Vancouver, B.C., Canada V6C 2G8
Telephone: (604) 665-8801
Telex: 04-508828 Fax: (604) 665-8806

WESTERN PULP, SQUAMISH OPERATION ENVIRONMENTAL STATEMENT

Western Pulp is committed to operating its facilities in an environmentally responsible manner.

At our Squamish kraft mill we completed a $200 million modernization program in 1986 which was largely environmentally driven. The new facilities included the best available technology in air emission control. Effluent quality was also greatly improved with installation of fibre and chemical reclaim systems and primary clarification to remove settleable solids. A further $20 million was spent in 1989 to improve brown stock washing and increase chlorine dioxide generating capacity.

With the recent emphasis on organochlorines, the Squamish mill has reduced its reliance on chlorine by over 60%. The mill consistently operates at over 50% chlorine dioxide substitution in the chlorination stage. Dioxin levels are no longer detectable in our finished product or mill effluent, only trace amount of furans are still occasionally present. Squamish is also able to provide a fully bleached molecular chlorine-free pulp in which chlorine dioxide only (from an R-8 generator) is used in the first bleaching stage. Hydrogen peroxide is used as the last bleaching step to enhance brightness stability.

Western Pulp just completed a comprehensive pilot plant effluent treatability study using activated sludge technology. Excavation is in progress for the installation of a low rate oxygen activated sludge effluent treatment system. This $50 million project will bring the Squamish mill into full compliance with the proposed new effluent regulations by late 1992.

The above measures together with an extensive employee training and increased awareness program will assure that our operation will have the least possible effect on the receiving environment.

popoiq03.p c+ 8.13.4 PO Receipt Packing Slip Inquiry 05/01/03

Supplier	PO	Receipt Qty	R	Receipt	Receiver	Packing Slip	Site	Initial
206053	BC100733	43426.00		02/25/02	R392435	bf20020220--	035	jp
206053	BC100733	-43.26		02/25/02	R392434	bf20020220-	035	jp-m-key
206053	BC100733	43.426		02/22/02	R392431	20020220-001	035	JP
206053	BC100733	42283.00		02/19/02	R392234	20020129+	035	gr
206053	BC100733	-42283.00		02/19/02	R392233	20020129-	035	gr
206053	BC100733	44155.00		02/18/02	R392152	20020211	035	gr
206053	BC100733	44254.00		02/11/02	R391648	20020204	035	gr
206053	BC100733	42283.00		02/04/02	R391493	20020129	035	gr
206053	BC100733	43571.00		01/28/02	R391180	20020121	035	gr
206053	BC100733	43962.00		01/15/02	R390638	bf20020107	035	gr
206053	BC100733	42998.00		12/19/01	R389896	bf12179-01	035	JP
206053	BC100733	43368.00		12/18/01	R389852	20011211	035	gr
206053	BC100733	43368.00		12/17/01	R389745	bf20011212+	035	gr
206053	BC100733	-44000.00		12/17/01	R389744	bf20011212-	035	gr
206053	BC100733	44000.00		12/17/01	R389706	bf20011212	035	JP
206053	BC100733	43876.00		12/06/01	R389215	12177	035	gr
206053	BC100733	43470.00		12/03/01	R389051	12164	035	gr
206053	BC100733	43896.00		11/20/01	R388501	12153	035	gr
206053	BC100733	43506.00		11/10/01	R388083	20011102	035	gr
206053	BC100733	43963.00		11/06/01	R387851	20011029	035	gr
206053	BC100733	43895.00		10/25/01	R387240	20011019	035	gr
206053	BC100733	42940.00		10/18/01	R386928	12133	035	JP
206053	BC100733	44400.00		10/10/01	R386535	20011004	035	gr
206053	BC100733	44042.00		10/05/01	R386276	20010924	035	gr
206053	BC100733	44077.00		09/28/01	R385978	121030101	035	gr
206053	BC100733	44379.00		09/28/01	R385943	20010919	035	gr
206053	BC100733	43995.00		09/18/01	R385416	20010910	035	gr
206053	BC100733	43237.00		09/11/01	R385035	20010831	035	gr
206053	BC100733	43944.00		08/28/01	R384318	12104	035	gr
206053	BC100733	44530.00		08/14/01	R383599	20010803	035	gr
206053	BC100733	43361.00		08/02/01	R383037	20010727	035	gr
206053	BC100733	43759.00		07/24/01	R382577	20010718	035	gr
206053	BC100733	43620.00		07/17/01	R382243	20010710	035	gr

2416368 ÷ 2000 = 1208.18 Tons

2002

2001

popoiq03.p c+ 5.13.4 PO Receipt Packing Slip Inquiry 05/01/03

Item Number: VK9866 Purchase Ord:
Supplier: Receiver: Site:
Packing Slip: Currency:
Receipt Date: 01/01/00 To: 12/31/02
Output: ibcmipb3

Supplier	PO	Receipt Qty	R	Receipt	Receiver	Packing Slip	Site	Initial
206053	BC100733	43846.00		12/19/02	R404700	bf12472	035	gr
206053	BC100733	43229.00		12/12/02	R404514	20021202	035	gr
206053	BC100733	43250.00		12/04/02	R404246	20021119	035	gr
206053	BC100733	43803.00		11/14/02	R403715	20021106	035	gr
206053	BC100733	42507.00		11/12/02	R403624	20021101	035	gr
206053	BC100733	42676.00		10/29/02	R403128	123820101	035	jm
206053	BC100733-	-41576.00		10/26/02	R403054	20020709-	035	gr
206053	BC100733	44168.00		10/17/02	R402711	12381	035	gr
206053	BC100733	44253.00		10/16/02	R402701	A99034	035	gr
206053	BC100733	44000.00		10/09/02	R402469	12303	035	jp
206053	BC100733	45602.00		10/07/02	R402299	bf12364	035	gr
206053	BC100733	41986.00		09/20/02	R401723	20020913	035	gr
206053	BC100733	44472.00		09/17/02	R401524	20020905	035	gr
206053	BC100733	43965.00		09/17/02	R401523	20020906	035	gr
206053	BC100733	43984.00		09/06/02	R401147	20020829	035	gr
206053	BC100733	43763.00		08/30/02	R400826	20020823001	035	jm
206053	BC100733	43748.00		08/24/02	R400594	20020819	035	gr
206053	BC100733	43335.00		08/17/02	R400290	20020808	035	gr
206053	BC100733	44000.00		08/12/02	R400030	20020802	035	gr
206053	BC100733	42744.00		08/09/02	R399909	bf20020729	035	jp
206053	BC100733	44700.00		07/30/02	R399545	20020715	035	gr
206053	BC100733-	41576.00		07/19/02	R399098	20020709	035	gr
206053	BC100733	43276.00		07/12/02	R398771	20020703	035	gr
206053	BC100733	43959.00		06/28/02	R398446	20020621-001	035	BZ
206053	BC100733	43799.00		06/25/02	R398344	20020617-001	035	jp
206053	BC100733	43518.00		06/17/02	R398005	20020610	035	gr
206053	BC100733	44208.00		06/10/02	R397646	20020603	035	gr
206053	BC100733-	43107.00		06/05/02	R397491	20020508+	035	gr
206053	BC100733-	-42899.00		06/05/02	R397490	20020508-	035	gr
206053	BC100733	44349.00		06/04/02	R397324	20020527	035	gr
206053	BC100733	44219.00		05/28/02	R397073	20020517	035	1622
206053	BC100733	44121.00		05/18/02	R396743	20020513	035	gr
206053	BC100733	42899.00		05/15/02	R396513	20020508	035	gr
206053	BC100733	42469.00		05/09/02	R396115	20020503	035	gr
206053	BC100733	43990.00		05/06/02	R395913	20020430	035	gr
206053	BC100733	43326.00		04/29/02	R395554	bf-20020422	035	gr
206053	BC100733	44117.00		04/24/02	R395297	20020416-003	035	BZ
206053	BC100733	43988.00		04/18/02	R395024	20020410	035	gr
206053	BC100733	44075.00		04/11/02	R394661	20020402-003	035	gr
206053	BC100733	45229.00		04/05/02	R394271	20020325-004	035	BZ
206053	BC100733	43995.00		03/27/02	R393928	20020318	035	gr
206053	BC100733	43546.00		03/19/02	R393609	20020311	035	gr
206053	BC100733-	-47.175		03/11/02	R393194	20020304003-	035	jp
206053	BC100733	44175.00		03/11/02	R393193	20020304003	035	jp
206053	BC100733-	47.175		03/11/02	R393192	20020304-003	035	jp
206053	BC100733	44372.00		03/06/02	R392959	bf20020227	035	gr
206053	BC100733	43656.00		03/01/02	R392744	BF20020221	035	gr
206053	BC100733	-400.00		02/25/02	R392436	bf20020220-+	035	jp